

Supporting Statement for Information Collection
Requirements contained in 50 CFR 23.12 and 23.15
Export or Re-export Permits

A. Justification

The following information is provided as part of a request to renew the Office of Management and Budget's approval for information collection pursuant to regulations that implement the Convention on International Trade in Endangered Species (CITES). These information collection requirements are contained in applications for permits that will allow the re-export of specimens of Appendix II and III species regulated by CITES, and the export of specimens of American alligator - Alligator mississippiensis, Alaskan brown bear - Ursus arctos, Alaskan gray wolf - Canis lupus, Bobcat - Lynx rufus, Lynx - Lynx canadensis, and River otter - Lutra canadensis, also species regulated by CITES. The application form for this activity was assigned number 3-200-26.

1. CITES regulates trade in many species whether wild caught or captive born through a system of permits and certificates. International shipments of CITES listed specimens must be accompanied by CITES documentation. Prior to the export or re-export of these specimens, the exporting or re-exporting country must determine that export will not be detrimental to the survival of the species (this finding is not needed for re-exports), that shipments of live animals be humane and whether the specimen was acquired lawfully. The information collection requirements necessary for the public to apply for CITES export or re-export certificate are contained in the current OMB approval. The appropriate sections of CITES and the implementing regulations mandating or authorizing the collection of information are attached.
2. This collection of information is achieved by using the Fish and Wildlife Service (Service) Application form 3-200-26. The information is collected pursuant to 50 CFR 13.12(b), to address the specific requirements contained in 50 CFR 23.12 and 23.15. The information collection is needed to enable the Director (FWS) to determine if the applicant qualifies for a permit.
3. To date, the electronic submission of the application is not possible. The Service must receive an originally signed application form. Facsimile and e-mailed signatures are not accepted. Currently, applicants may submit any supporting documentation or information missing from the application, other than an original signature, via facsimile transmission. Applications may obtain an application packet via the fax-back system. Applications are also available through the Internet. We expect that as technology advances, we will be able to accept electronic submissions of applications. Therefore, we changed the format of page 1 of the application form so that the information fields on the form correspond to the data fields in our

service-wide permit issuance and tracking computer system. Once the form is approved, it will be posted on the Internet in a format that will allow the public to complete the form on-line and print the completed form for signature and submission.

We made one modification to the supplemental information. We are requesting that the applicant describe the location of the wildlife to be imported. This will allow the application examiner to determine if, in fact, a permit is required by the importer/exporter.

4. No duplicate information is collected elsewhere in the Service that could be utilized to decide whether a CITES export permit or re-export certificate can be issued. No other Federal agency collects this type of information except general information requirements such as name, address, etc.
5. The Service estimates that 200 small businesses annually submit applications that contain these information collection requirements (i.e. applications for CITES export permit and re-export certificates). This is not considered a vast number of small businesses. All other applicants for this type of permit are individuals. In order to reduce burden the form has been made more user friendly. The Service has offices in each of its seven geographical regions that issue re-export certificates for Appendix II and III species, and export permits for the six specific species listed above.
6. The consequence of not collecting the information contained in this application form is that the applicant would not be issued a permit since the collected information is either required on the permit itself or needed to make the necessary findings under CITES. Consequently, the wildlife in question would be prohibited from leaving the country.
7. It is not anticipated that a respondent would have to address any of the information collection methods or circumstances described in this justification instruction.
8. Attached is a copy of the Federal Register notice of November 19, 2000, (65 FR 30246) documenting the Service's notice soliciting comments on the information collection prior to submission to OMB. The Service's Information Collection Clearance Officer indicates that one no comments were received in response to this notice regarding the CITES Export Permit. Opportunities for informal public comment are also available through extensive personal contact with applicants and during annual permit workshops conducted at national conferences for various types of potential applicants. The Service also continuously internally evaluates the effectiveness of its applicants as they relate to regulations for this permit.
9. There is no provision within CITES or ESA to provide any gift or payment to respondents.
10. The information collected is subject to the requirements of the Privacy Act and the Freedom of Information Act the Service can assure confidentiality to respondents. All applicants receive an information sheet explaining the requirements of both Acts.

11. None of the information collected on this application form is of a sensitive nature.

12. Service experience indicates that about 2,235 applicants will apply for export and re-export permits this year. The frequency of response is on occasion. It will take an average of 1 hour for each respondent to complete the application. The annual burden estimate for this survey is 2,235 hours. The hourly cost to an individual is assumed to be \$10.00 per hour for a Total Annual Burden of \$2,235.00.

13. The annual non-hour dollar burden to the respondents is approximately \$55,875 (2,235 applicants multiplied by the \$25.00 application fee).

Type of Information	Number of Respondents Annually	Number of Responses	Average Time Required per Response	Total Annual Burden Hours	Total Annual Non-Hour Dollar Burden
CITES Export / Re-export Permit	2,235	2,235	1 hour	2,235	\$55,875.00

14. The estimate of annualized cost to the Federal Government is estimated to be approximately \$67,050 or less. This value is based on the average salary per hour of the Service personnel likely to be involved in the processing of the applications (\$20), plus operational expenses per hour (\$10), multiplied by the number of hours estimated to process an application (1 hour), multiplied by the average number of applications the Service receives each year (2,235).

15. The decrease in Total Annual Burden hours (125decrease) and total annual non-hour dollar burden resulted from a decrease in the number of applicants using the 3-200-26 application form.

16. There are no plans for publication of the results of this information collection.

17. The Service is not seeking approval to not display the expiration date for OMB approval.

18. There are no exceptions to the certification statement contained in Item 19 of OMB Form 83-I for the information being collected by this application form.

B. This information collection was designed to conform to the requirements of § 9(f) of ESA, 16 U.S.C. 1538(f). The collection of this information does not employ statistical methods.